

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TSDC, LLC,)	CASE NO. 1:14-cv-02699
)	
Plaintiff,)	JUDGE DONALD C. NUGENT
)	
v.)	
)	PLAINTIFF'S MOTION FOR
ANTOINETTE GALVAN, et al.,)	EXTENSION OF TIME TO FILE
)	RESPONSE TO DEFENDANTS'
Defendants.)	MOTION TO COMPEL

Plaintiff TSDC, LLC's ("Plaintiff" or "TSDC") current counsel of record, John M. Stryker,¹ previously filed a motion requesting an extension of time to file a response to defendants' pending motion to compel (E.C.F. 30), which was granted by the Court through and including December 17, 2015. Plaintiff, by and through Mr. Stryker, recently filed a second motion for extension of time yesterday (E.C.F. 33).

Yesterday, TSDC's newly retained counsel contacted defendants' counsel, Gordon E. Gray, III via telephone, with the intention of resolving defendants' motion to compel. This conference included a productive discussion regarding how defendants propose to resolve the motion to compel. Defendants' counsel also invited TSDC to submit a proposal on how to resolve the matter.

However, given that TSDC's new counsel has only been recently retained and recently filed the pending Motion for an Order Granting Permission to Substitute Counsel (E.C.F. 32), they require additional time to address the underlying facts relating to this discovery dispute and,

¹ Philip Bautista and Amelia Workman Farago and the law firm of Taft Stettinius & Hollister LLP filed a motion to substitute counsel in the case.

upon resolution, eventually prepare any responsive documents and interrogatory responses.² Because TSDC intends to resolve the discovery dispute underlying the motion to compel, it does not believe that the parties will require further Court intervention.

TSDC therefore respectfully requests the Court grant an additional extension of time for it to respond to the motion to compel, if necessary, through and including December 30, 2015.

Respectfully submitted,

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² Plaintiff will also require time to provide appropriate responses due to the holiday.

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2015, the foregoing was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

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